

1 CALVIN E. DAVIS, State Bar No. 101640
AARON P. RUDIN, State Bar No. 223004
2 REBECCA KRIKORIAN, State Bar No. 334882
GORDON REES SCULLY MANSUKHANI, LLP
3 633 West Fifth Street, 52nd Floor
Los Angeles, CA 90071
4 Telephone: (213) 576-5000
Facsimile: (213) 680-4470
5 Email: cdavis@grsm.com
arudin@grsm.com
6 rkrikorian@grsm.com

7 *Attorneys for Plaintiff/Counterdefendant*
Guardian Protection Products, Inc.

8 DYLAN J. LIDDIARD, State Bar No. 203055
9 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
10 650 Page Mill Road
Palo Alto, California 94304
11 Telephone: (650) 493-9300
Facsimile: (866) 974-7329
12 Email: dliddiard@wsgr.com

13 JOHN P. FLYNN, State Bar No. 141094
COLLEEN BAL, State Bar No. 167637
14 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
15 One Market Plaza
Spear Tower, Suite 3300
16 San Francisco, California 94105
Telephone: (415) 947-2000
17 Facsimile: (866) 974-7329
Email: jflynn@wsgr.com
18 cbal@wsgr.com

DYLAN G. SAVAGE, State Bar No.
310452
CASSIE L. BLACK (*pro hac vice*)
SAMANTHA ARNOLD (*pro hac vice*)
WILSON SONSINI GOODRICH &
ROSATI
Professional Corporation
1301 Avenue of the Americas, 40th Floor
New York, NY 10019
Telephone: (212) 999-5800
Facsimile: (866) 974-7329
Email: dsavage@wsgr.com
cblack@wsgr.com
sarnold@wsgr.com

STUART A. WILLIAMS (*pro hac vice*
forthcoming)
WILSON SONSINI GOODRICH &
ROSATI
Professional Corporation
375 Southpointe Boulevard
Canonsburg, Pennsylvania 15317
Telephone: (917) 288-5094
Facsimile: (866) 974-7329
Email: swilliams@wsgr.com

19
20
21 *Attorneys for Defendant/Counterclaimant*
22 *G.P.P., Inc.*
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

GUARDIAN PROTECTION PRODUCTS,
INC., a Delaware corporation,

Plaintiff,

vs.

G.P.P., INC. d/b/a GUARDIAN
INNOVATIVE SOLUTIONS, a Pennsylvania
corporation,

Defendant.

CASE NO. 1:20-CV-01680-SKO

**STIPULATION AND ORDER TO
MODIFY SCHEDULING ORDER**

(Doc. 72)

Complaint filed: November 24, 2020

Counterclaim filed: February 22, 2021

Pre-Trial Conference: June 18, 2025, at 2:30
p.m.

Trial: August 12, 2025, at 8:30 a.m.

G.P.P., INC. d/b/a GUARDIAN
INNOVATIVE SOLUTIONS, a Pennsylvania
corporation,

Counterclaimant,

vs.

GUARDIAN PROTECTION PRODUCTS,
INC., a Delaware corporation,

Counterdefendant.

Pursuant to the Court's modified Scheduling Order set forth in its November 14, 2024 Order (Doc. 69) and L.R. 143, Plaintiff/Counterdefendant Guardian Protection Products, Inc. ("Guardian") and Defendant/Counterclaimant G.P.P. Inc. d/b/a Guardian Innovative Solutions ("GIS") hereby submit the following stipulation and proposed order to further modify the Scheduling Order.

WHEREAS, on April 16, 2021, this Court issued a Scheduling Order (Doc. 30) in this matter;

WHEREAS, on October 14, 2021 the parties submitted a Stipulation and Proposed Order to modify the scheduling order (Doc. 40), and on October 15, 2021 the Court modified the Scheduling Order (Doc. 41);

1 WHEREAS, following a week-long trial, on December 13, 2021, this Court issued a final
2 judgment (Doc. 499) in the related case entitled *G.P.P., Inc. d/b/a Guardian Innovative Solutions*
3 *v. Guardian Protections Products, Inc., et al.*, Case No. 1:15-cv-00321-SKO (the “Related Case”);

4 WHEREAS, on February 3, 2022, the parties submitted a Further Stipulation and
5 Proposed Order to modify the scheduling order based largely on the status of the Related Case
6 (Doc. 42), and on February 4, 2022, the Court modified the Scheduling Order (Doc. 43);

7 WHEREAS, on August 3, 2022, the parties submitted a Further Stipulation and Proposed
8 Order to modify the scheduling order based largely on the status of the Related Case (Doc. 44),
9 and on August 5, 2022, the Court modified the Scheduling Order (Doc. 46);

10 WHEREAS, on January 30, 2023, the parties submitted a Further Stipulation and Proposed
11 Order to modify the scheduling order based largely on the status of the Related Case (Doc. 48),
12 and on January 31, 2023, the Court modified the Scheduling Order (Doc. 49);

13 WHEREAS, on August 22, 2023, the parties submitted a Further Stipulation and
14 Proposed Order to modify the scheduling order (Doc. 50), and on August 24, 2023, the Court
15 modified the Scheduling Order (Doc. 51);

16 WHEREAS, on April 17, 2024, the parties submitted a Further Stipulation and Proposed
17 Order to modify the scheduling order (Doc. 53), and on April 18, 2024, the Court modified the
18 Scheduling Order (Doc. 54);

19 WHEREAS, on October 15, 2024, the parties submitted a Further Stipulation and
20 Proposed Order to modify the scheduling order (Doc. 60), and on October 16, 2024, the Court
21 modified the Scheduling Order (Doc. 61);

22 WHEREAS, on October 16, 2024, GIS filed a motion to extend fact discovery to permit
23 additional fact discovery and to permit disclosure under the protective order (Doc. 62), and, on
24 November 14, 2024, the Court granted GIS’ motion (Doc. 69), modifying the Scheduling Order
25 as follows:
26
27
28

Event	Continued Date
Non-Expert Discovery	December 20, 2024
Expert Disclosures	January 8, 2025
Rebuttal Expert Disclosures	January 22, 2025
Expert Discovery	February 5, 2025
Non-Dispositive Motion Filing	February 5, 2025
Non-Dispositive Motion Hearing	March 12, 2025
Dispositive Motion Filing	February 7, 2025
Dispositive Motion Hearing	February 12, 2025
Deadline to Request Settlement Conference	May 14, 2025, or 90 days before trial, whichever is later
Pretrial Conference	June 18, 2025, at 2:30 p.m.
Trial	August 12, 2025, at 8:30 a.m.

WHEREAS, the parties have worked in good faith to complete the remaining discovery, but due to certain scheduling matters and circumstances outside their control, those efforts remain ongoing;

WHEREAS, the parties are seeking a short extension to allow for the completion of the remaining discovery and corresponding adjustments to the filing of both non-dispositive and dispositive motions;

WHEREAS, the requested extension will not require, and the parties are not seeking, any modification of the trial dates as established in the Court's November 14, 2024 Order (Doc. 69);

WHEREAS, the parties believe that the extensions requested herein are reasonable and necessary in order to provide the parties with adequate time to complete the remaining discovery and prepare any associated motions;

ACCORDINGLY, IT IS HEREBY STIPULATED and REQUESTED by the parties that the Scheduling Order set out in this Court's November 14, 2024 order (Doc. 69) be further modified as follows:

Event	Continued Date
Expert Disclosures	January 21, 2025
Rebuttal Disclosures	February 5, 2025
Expert Discovery	February 19, 2025
Non-Dispositive Motion Filing	February 19, 2025
Non-Dispositive Motion Hearing	March 26, 2025
Dispositive Motion Filing	February 26, 2025
Dispositive Motion Hearing	April 2, 2025
Deadline to Request Settlement Conference	May 14, 2025, or 90 days before trial, whichever is later
Pretrial Conference	June 18, 2025, at 2:30 p.m.
Trial	August 12, 2025, at 8:30 a.m.

IT IS SO STIPULATED.

Dated: January 10, 2025

GORDON REES SCULLY MANSUKHANI,
LLP

By: /s/ Aaron P. Rudin
Calvin E. Davis
Aaron P. Rudin
Rebecca Krikorian
Attorneys for Plaintiff/Counterdefendant
GUARDIAN PROTECTION PRODUCTS,
INC.

1 Dated: January 10, 2025

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

2
3 By: /s/ Dylan G. Savage
4 Dylan G. Savage
5 Attorneys for Defendant/Counterclaimant
6 G.P.P., INC. d/b/a GUARDIAN
7 INNOVATIVE SOLUTIONS
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Finding good cause therefore (see Fed. R. Civ. P. 16(b)(4)), the parties' stipulation (Doc. 72) is hereby approved. Accordingly, IT IS HEREBY ORDERED that the Scheduling Order (Doc. 69) is MODIFIED as follows:

Event	Continued Date
Expert Disclosures	January 21, 2025
Rebuttal Disclosures	February 5, 2025
Expert Discovery	February 19, 2025
Non-Dispositive Motion Filing	February 19, 2025
Non-Dispositive Motion Hearing	March 26, 2025
Dispositive Motion Filing	February 26, 2025
Dispositive Motion Hearing	April 2, 2025
Deadline to Request Settlement Conference	May 14, 2025, or 90 days before trial, whichever is later
Trial	August 12, 2025, at 8:30 a.m.

IT IS SO ORDERED.

Dated: January 10, 2025 /s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE

DECLARATION OF DYLAN G. SAVAGE

I, Dylan G. Savage, declare as follows:

1. I am an attorney at law duly authorized to practice before the United States District Court for the Eastern District of California. I am a Partner with the law firm of Wilson Sonsini Goodrich & Rosati P.C. (“WSGR”), counsel of record for Defendant/Counterclaimant G.P.P. Inc., d/b/a Guardian Innovative Solutions (“GIS”) in the above captioned action. I am familiar with the facts and circumstances in the above-entitled matter as they relate to this Declaration, and if called upon, I could and would testify competently thereto.

2. On April 16, 2021, this Court issued a Scheduling Order [Dkt. No. 30] in this matter.

3. On October 14, 2021 the parties submitted a Stipulation and Proposed Order to modify the scheduling order [Dkt. No. 40], and on October 15, 2021 the Court modified the Scheduling Order [Dkt. No. 41].

4. Following a week-long trial, on December 13, 2021, this Court issued a final judgment [Dkt. No. 499] in the related case entitled *G.P.P., Inc. d/b/a Guardian Innovative Solutions v. Guardian Protections Products, Inc., et al.*, Case No. 1:15-cv-00321-SKO (the “Related Case”).

5. On February 3, 2022, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order based largely on the status of the Related Case [Dkt. No. 42], and on February 4, 2022, the Court modified the Scheduling Order [Dkt. No. 43].

6. On August 3, 2022, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order based largely on the status of the Related Case [Dkt. No. 44], and on August 5, 2022, the Court modified the Scheduling Order [Dkt. No. 46].

7. On January 30, 2023, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order based largely on the status of the Related Case [Dkt. No. 48], and on January 31, 2023, the Court modified the Scheduling Order [Dkt. No. 49].

8. On August 22, 2023, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order [Dkt. No. 50], and on August 24, 2023, the Court modified the Scheduling Order [Dkt. No. 51].

9. On April 17, 2024, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order [Dkt. No. 53], and on April 18, 2024, the Court modified the Scheduling Order [Dkt. No. 54];

10. On October 15, 2024, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order [Dkt. No. 60], and on October 16, 2024, the Court modified the Scheduling Order [Dkt. No. 61];

11. On October 16, 2024, GIS filed a motion to extend fact discovery to permit additional fact discovery and to permit disclosure under the protective order [Dkt. No. 62], and, on November 14, 2024, the Court granted GIS' motion [Dkt. No. 69], modifying the Scheduling Order as follows:

Event	Continued Date
Non-Expert Discovery	December 20, 2024
Expert Disclosures	January 8, 2025
Rebuttal Expert Disclosures	January 22, 2025
Expert Discovery	February 5, 2025
Non-Dispositive Motion Filing	February 5, 2025
Non-Dispositive Motion Hearing	March 12, 2025
Dispositive Motion Filing	February 7, 2025
Dispositive Motion Hearing	February 12, 2025
Deadline to Request Settlement Conference	May 14, 2025, or 90 days before trial, whichever is later
Pretrial Conference	June 18, 2025, at 2:30 p.m.
Trial	August 12, 2025, at 8:30 a.m.

1 12. The parties have worked in good faith to complete the remaining discovery, but
2 due to certain scheduling matters and circumstances outside their control, those efforts remain
3 ongoing;

4 13. The parties are seeking a short extension to allow for the completion of the
5 remaining discovery and corresponding adjustments to the filing of both non-dispositive and
6 dispositive motions;

7 14. The requested extension will not require, and the parties are not seeking, any
8 modification of the trial dates as established in the Court's November 14, 2024 Order [Dkt. No.
9 69];

10 15. The parties believe that the extensions requested herein are reasonable and
11 necessary in order to provide the parties with adequate time to complete the remaining discovery
12 and prepare any associated motions;

13 I declare under penalty of perjury under the law of the United States of America that the
14 foregoing is true and correct and that this Declaration was executed on January 8, 2025 in New
15 York City, New York.

16
17 Dated: January 8, 2025

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

18
19 /s/ Dylan G. Savage

Dylan G. Savage

20 1301 Avenue of the Americas, 40th Floor

21 New York, NY 10019

22 Telephone: (212) 999-5800

Facsimile: (866) 974-7329

Email: dsavage@wsgr.com

23 *Attorneys for Defendant/Counterclaimant G.P.P.,*
24 *Inc.*